



California Independent  
System Operator Corporation

September 13, 2006

**VIA ELECTRONIC FILING**

The Honorable Magalie R. Salas  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

**Re: Williams Power Company, Inc.  
Docket No. ER05-406-001 and**

**CAISO v. Cabrillo Power I, LLC, et al.  
Docket No. EL02-15-000**

Dear Secretary Salas:

Transmitted herewith for electronic filing in the above-referenced proceedings are the Comments of the California Independent System Operator Corporation.

Thank you for your attention to this matter.

Yours truly,

**/s/ Sidney Mannheim Davies**

Sidney Mannheim Davies  
Assistant General Counsel  
Counsel for the California Independent  
System Operator Corporation

Enclosure  
cc: Service List

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

<b>Williams Power Company, Inc.</b>	)	<b>Docket No. ER05-406-001</b>
<i>and</i>	)	
<b>CAISO v. Cabrillo Power I, LLC</b>	)	
	)	<b>Docket No. EL02-15-000</b>

**COMMENTS OF THE  
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

Pursuant to Rule 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”), 18 C.F.R. § 385.214, and the Commission’s August 25, 2006, Combined Notice of Filing, the California Independent System Operator Corporation (“CAISO”) submits these Comments in response to the August 23, 2006, filing of a Revised Refund Report by Williams.

On August 10, 2006, the CAISO filed a provisional protest of Williams’ July 20, 2006 Refund Report noting that Williams had used an incorrect interest rate in its calculations. The CAISO further indicated that it had informed Williams of this error and anticipated that that Williams would be filing a corrected refund report. William’s August 23, 2006, Revised Refund Report shows corrected interest calculations. Accordingly, the CAISO’s concerns are now resolved.

Dated: September 13, 2006

Respectfully submitted

**/s/ Sidney Mannheim Davies**  
Sidney Mannheim Davies  
California Independent System  
Operator Corporation  
151 Blue Ravine Road  
Folsom, CA 95630  
(916) 608-7144 (tel)  
(916) 608-7222 (fax)

**CERTIFICATE OF SERVICE**

I hereby certify that I have, this 13<sup>th</sup> day of September 2006, caused to be served a copy of the forgoing document upon all parties listed on the official service list compiled by the Secretary of the Federal Energy Regulatory Commission in this proceeding.

**/s/ Sidney Mannheim Davies**  
Sidney Mannheim Davies